Wild Horse Wind Power Project
Scoping Summary

Prepared for:

Washington State Energy Facility Site Evaluation Council

Prepared by:

Jones & Stokes

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WILD HORSE WIND POWER PROJECT
SCOPING SUMMARY

Proposed Project

On March 9, 2004, Wind Ridge Power Partners, LLC (Wind Ridge), a wholly owned subsidiary of Zilkha Renewable Energy, submitted an application to the Washington State Energy Facility Site Evaluation Council (EFSEC) to construct and operate the Wild Horse Wind Power Project, a wind powered electrical generation facility. The proposed project would consist of up to 158 wind turbines, and would have an installed nameplate capacity of up to 312 megawatts. In addition, Wind Ridge Power Partners LLC seeks approval to build and operate up to two 230 kV transmission feeder lines, one (5-mile segment) to allow interconnection with the Bonneville Power Administration (BPA) transmission system and one (8-mile segment) to allow interconnection with Puget Sound Energy (PSE) transmission system. The proposed Wild Horse Wind Power Project would be located within Kittitas County, along the ridge tops of Whiskey Dick Mountain, two miles north of Vantage Highway, and eleven miles east of the City of Kittitas.

Environmental Analysis

Wind Ridge has requested to receive certification of the Wild Horse Wind Power Project under EFSEC statute and rules. In accordance with State Environmental Policy Act (SEPA) (WAC 197-11) and EFSEC environmental review procedures, EFSEC initiated its review process as required by Chapter 80.50 Revised Code of Washington and Title 463 Washington Administrative Code (WAC). Under WAC 173-11-938, EFSEC is lead SEPA agency for this project. EFSEC issued a Determination of Significance and will be preparing an environmental impact statement (EIS) for this project.

If interconnection is to the BPA transmission system, BPA would perform a separate environmental review at that time, for review by the public and interested agencies.

Public Comments/Scoping

EFSEC, as lead agency for the proposed action under consideration, requested agency, affected tribes, and public comment on the proposed scope of the EIS to ensure all potential significant impacts are adequately addressed. When siting a new energy facility, EFSEC is also required to hold a public information meeting in the county in which a project is proposed. EFSEC hosted both an agency and a public EIS scoping meeting on April 22, 2004 in Kittitas County. The agency meeting was held at 10:30 a.m. at the Home Arts Building, Kittitas County Fairgrounds, in Ellensburg, WA. A land use hearing and public information and scoping meeting were held that same evening in the same location from 6:00 to 9:00 p.m. At both meetings, EFSEC staff described the state's siting process, followed by a short presentation by the Counsel for the

Environment, a Washington State Assistant Attorney General who represents the citizens of Washington State before EFSEC. Wind Ridge then presented a description of the project, reasons why the proposed site or location was selected, and a short summary of anticipated environmental, social, and economic impacts.

Agency and public comments regarding the scope of the DEIS were recorded during these meetings and are compiled in this summary report. This report also summarizes written comments submitted by comment form, e-mail, fax, and letter. Written public comments were received through April 30, 2004. A complete copy of the testimony and comments provided is available upon request from EFSEC by calling (360) 956-2121, by e-mail at efsec@ep.cted.wa.gov, or by mail at P.O. Box 43172, Olympia, Washington, 98504-4172. The list of commentors is provided below, following the list of comments.

Based upon scoping completed to date, the Draft EIS will analyze the following elements of the environment that could potentially be impacted by the proposed project and the three scenarios under consideration. Comments are grouped under the environmental elements to be evaluated (and repeated, in some cases, if they relate to more than one issue). Approximately 20 people attended the agency meeting and about 120 people attended the evening public scoping meeting on April 22nd.

Primary concerns raised during the scoping process include avian mortality, potential impacts to wildlife and wildlife habitat (shrub-steppe), potential impacts to the local economy, fire hazards, lack of land use consistency, and the cumulative effects of three proposed wind farms in close proximity.

Earth

- Will DNR approval be required for surface mining?
- An erosion study/erosion control plan is needed for the analysis.
- Address potential impacts of operating three on-site quarries, along with their potential impacts to surface or groundwater.

Air Quality

- Evaluate air quality effects related to construction of the project.

Water Resources/Water Quality

- Can the project water resource meet high peak demand for project and other users?
- Erosion study/control plan for run off and snowmelt is needed.
- A storm water analysis is needed.
- Address potential impacts to surface or groundwater from the on-site quarries.

- Assess the potential impacts from operating a cement batch plant.

Wetlands/Vegetation

- Consider the value of contiguous areas of remaining forest.
- Suggest restoration of Hells Kitchen in Ginkgo (shrub-steppe area).
- Concern that "temporarily" disturbance to shrub-steppe habitat is not temporary.
- Consider mitigation to replant with sagebrush and native grasses in consultation with WDFW methods and suggested species.
- Address difficulty in restoration and time required to re-establish a mature shrub-steppe community.
- Include analysis of direct loss of shrub-steppe habitat, both temporary and permanently affected native rangeland plant communities.
- Consider mitigation to close entire area to cattle grazing to allow native grasses to reestablish and encourage endangered species to return.
- Time construction activities to occur when soils are dry to reduce damage to plant communities.
- Address potential for spread of noxious weeds.

Wildlife

- Potential listing of sage grouse could impact how associated habitats are considered.
- Section 7 review would include transmission corridor and project facilities.
- Consider non-guyed monopole met tower design for permanent met towers to minimize bird kill.
- Have surveys been done for the long-billed curlew?
- Assess neotropical migratory bird use by conducting night surveys.
- Evaluate the impacts of the project to avian species (i.e. bird and bat mortality); including striking turbines, meteorological towers, guy lines, and overhead transmission feeder lines.
- Consider avian flight patterns when evaluating impacts to raptors (e.g. they soar along updrafts of ridgelines).
- Different methodologies are needed for avian studies (bird/bat surveys) to include longer duration and early dawn/dusk/night studies.
- Although Bald Eagles have a seasonal presence, Golden Eagles are here year-round and have an abundant food supply (range mice).
- Consider shrub-steppe habitat as part of the Colockum Management Unit (Sage Grouse Recovery Plan).
- Pulsating red lights attract night migrating birds.
- Concerned that no "take permits" for Golden and Bald Eagles are addressed.
- Consider mitigation to avoid ridges for turbine siting.
- A post construction wildlife study should be conducted to provide opportunity for adaptive management.

- Consider small animal displacement (e.g. rattlesnake, rodents).
- Consider turbine impacts on potential return of birds to natural/historic nesting grounds.
- Evaluate big-game use within the project area.
- Evaluate approximately 17 miles of new roads to wildlife use.
- Include analysis of direct loss of wildlife habitat, both temporary and permanently affected native rangeland plant communities.
- Discuss mitigation site management; disposition of the site upon decommissioning of the project.
- Evaluate indirect impacts to wintering deer and elk from facility maintenance and public motor vehicle access/use of project roads.
- Evaluate the potential for impact to wildlife habitat from ORV use by plant operators or the general public.
- Evaluate bird strikes at the three different turbine heights.
- Consider potential damage from deer and elk to adjacent agricultural lands (crops and irrigated pasture), if public hunting precluded.

Fisheries

- Consider impacts to critical areas (e.g. close proximity of wind turbines to creeks).

Energy and Natural Resources

- Discuss the "need" for the facility relative to the energy demand at local/state level.
- Discuss the need for "clean, sustainable" energy because of Earth's environmental degradation.
- Discuss inefficiency and expense of wind power.
- Provide discussion on benefits of wind power.

Noise

- Evaluate noise (Db levels) impacts from the proposed project. Evaluate differences between the three different turbine sizes.

Land Use

- Impacts to existing hunting restrictions on property adjacent to the proposed project.
- Discuss impacts on recreation in the area.

- Use clear rational for proposed setbacks/alternatives (setbacks from homes, federal transmission lines, county roadways).
- Address inconsistency with local land use and zoning regulations.
- Address need for conditional use permit for concrete batch plant and transmission lines exceeding 115 kV.
- Keep wind farms away from the populace.

Visual Resources/Light and Glare

- Address the impacts to the viewshed.
- Unsightly prominence from I-90.
- Evaluate shadow flicker for the three different sizes of turbine.
- Remove the 45 turbines on the west side of Whiskey Dick and the ridge to remove glare/flashing lights from view of over 2000 homes.

Socioeconomics/Public Utilities

- An economic analysis is needed to look at wind turbine inefficiency verses hydropower, considering salmon recovery efforts, and the cost of power and electric rates.
- Consider the rarity, economic value, and psychological value of remaining contiguous areas of forest.
- Look at alternative uses and development; considering the financial cost of other types of projects (i.e. home development).
- Compare the subsidies of other types of projects.
- An economic analysis is needed to assess impacts on the cost of fire mitigation, property values, and potential loss of jobs.
- Evaluate sources of tax revenues.
- Evaluate the impact of Applicant purchasing land for the project, instead of leasing it.
- Evaluate the cost of firefighting.
- Evaluate the effects on radio and television reception and provide mitigation.
- Assess loss of tax revenues from property owners and local business.
- Address lack of compensation for losses to nearby property owners for negative effects on views, utilities, noise, local business, construction starts, and tourism.

Cultural Resources

- Should it be impossible to avoid archeological sites, testing for significance would be necessary. Pending significance findings, additional mitigation may be necessary.
- Consider a monitoring plan to address potential archeological discovery.

Traffic and Transportation

- Evaluate impacts of tourism on county roads.
- Consider emergency access.
- Consider ice impacts to transportation safety.
- Include impacts on current and proposed air flight patterns and flight communications.
- Describe the future use of access roads and their use by the public.
- Consider accident data in transportation analysis.
- Consider winter maintenance impacts on roads that are currently closed during the winter.
- Assess traffic impacts from setting up a kiosk and bringing in visitors.
- Impact of number of trucks being used for water delivery.
- Discuss carpooling for trip reduction.

Health and Safety

- Fire District 2 is in negotiations with Applicant for contract for fire protection in the area.
- Evaluate the risks of fire hazard during construction activities.
- Evaluate fire protection and DNR land.
- Consider the impacts on cost of fire fighting.
- Do FCC style communications study (or other appropriate study) to ensure emergency communications won't be degraded.
- Have an environmental clean-up company under contract for hazardous spills.
- Have a water supply for fire fighting support as mitigation to keep fire in a manageable size incident.
- Need an FAA style lighting plan to avoid aircraft mishaps to limit fire response.
- Provide fire prevention instruction to all construction workers.
- Have agreements in place to provide emergency services.

Cumulative Impacts

- Evaluate the cumulative impacts on fire fighting resources.
- Evaluate the cumulative impacts of three wind farms on avian mortality.
- Consider cumulative impacts associated with the permanent loss of wildlife habitat.
- Include various WSDOT proposed projects along I-90 in the cumulative impacts analysis.

Project Facilities/Miscellaneous

- If interconnection requested to BPA system, it will undergo NEPA review at that time.
- Why the need for permanent met towers once the project is built.
- Identify where underground and overhead lines are proposed.
- Provide a decommissioning bond in FY2029 dollars.
- Who is responsible for site clean-up should the project be built and abandoned.
- Evaluate all three proposed turbine designs.

Alternatives

- Under No Action, look at alternative uses and development; the finance/cost of other type of project (i.e. low-density residential development), and discuss related services (police, schools, utilities) that increased residential development would require.

***Commentors*:**

Federal Agencies

Rogalski, Floyd	U.S. Forest Service, Cle Elum District

State Agencies

Al-Tamimi, Salah	Washington State Department of Transportation, South Central Region
Clear, Gwen	Washington State Department of Ecology, Central Regional Office
Holter, Russell	Washington State Archaeology and Historic Preservation
Jolly, Bill	Washington State Parks and Recreation
Kramer, Stephanie	Washington State Archaeology and Historic Preservation
Lane, John	Attorney General's Office, Council for the Environment
Renfrow, Brent	Washington Department of Fish and Wildlife

Local Government

Bennett, Paul	Kittitas County Department of Public Works
Gaidos, Derald	Kittitas County Department of Building and Fire Safety
White, Clay	Kittitas County Community Development Services

Businesses and Individuals

Baldi, J. and Gloria	
Bates, Lee	
Binette, Roger	
Burdyshaw, Emilia	
Cole, Chris	
Garrett, Ed	
Howard, Jeffrey	
Johnson, Keith	Kittitas Audubon Society
Knudson, Desmond	
Lee, Duane	Operating Engineers Training Office
Ling, Sonja	Renewable Northwest Project
Nelson, Janet	
Norment, Anne	
Orendorff, Mark and Rhonda	
Robertson, Mike	
Schaller, Lawson	
Schwab, Al and Diane	
Skaggs, Jim and Diane	
Strand, Debbie	Economic Development Group of Kittitas County
Tuben, Mike	
Verhey, Steve	
Whitteck, Phyllis	
Wise, Helen	

How the Comments are Used

All the comments received will help identify the key issues to be addressed in the EIS, as well as the impacts of most concern. Everyone who attended the meetings was given the opportunity to be added to the project mailing list.

Project Schedule and Next Steps

- EFSEC plans to have a Draft EIS ready for public review and comment in the summer of 2004. Questions about the proposal, should be directed to Irina Makarow at (360) 956-2047, by email at irinam@ep.cted.wa.gov.